

ATTORNEYS-AT-LAW

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February 11, 2022

VIA ECF and Fax

Honorable John Milton Young
3810 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: *Sciore v. Monteverde, McGrath, and Centric Bank*
EDPa. No. 2:21-cv-05151-JMY

Dear Judge Young:

I filed the Complaint in this action and my firm represents the Plaintiff, Michael Sciore. Mr. Sciore is represented by the New York law firm Lewis and Lin, LLC in other actions, including other actions pending in the Eastern District of Pennsylvania.

This morning I filed a motion for admission *pro hac vice* of Lewis and Lin, LLC attorney Lauren Valli, Esquire. The motion is pending.

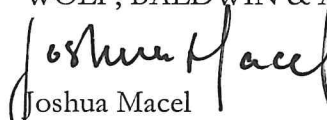
I enclosed a letter from Ms. Valli, in which she requests a continuance of time to serve the Complaint and Summons.

I apologize for the delay in filing the application for admission *pro hac vice*. I filed the action in November, and two days later I received difficult personal news that caused me to take an unexpected leave of absence. I say this only to explain why I took so long to file the motion for application for admission *pro hac vice* and why I failed to mail the request for waiver of service. As you will see from Ms. Valli's attached letter, the continuance request has nothing to do with my leave of absence.

I will make myself available to answer any questions at your convenience. Thank you for your time and consideration.

Very truly yours,
WOLF, BALDWIN & ASSOCIATES, P.C.

By:


Joshua Macel

Enc: Letter from Valli to Judge Young re extension (02/11/2022)

cc: Lauren Valli; Terrence Monteverde; William McGrath; Centric Bank

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February 11, 2022

VIA FAX

Honorable John Milton Young, U.S.D.J.
4007 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Courtroom 4-A

Re: *Michael Sciore v. Monteverde et al.*
Case No.: 2:21-cv-05151-JMY

Dear Judge Young:

We represent Plaintiff Michael Sciore ("Plaintiff") in the above referenced action. We write pursuant to Your Honor's Policies and Procedures A(1) to request an extension of time to serve the defendants in this action. Currently the deadline is February 22, 2022¹. Plaintiff requests a 90-day extension (i.e. until May 23, 2022) to serve defendants. No request of this kind has been made by Plaintiffs.

Plaintiff makes this request in light of settlement discussions between himself and Defendant Centric Bank ("Centric Bank") in other litigations. Plaintiff believes that a settlement

¹ The original deadline was February 20, 2022, which is a Sunday, and the following day is President's Day, a federal holiday. Accordingly, the deadline is Tuesday, February 22, 2022.

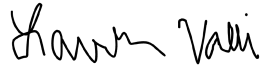
LEWIS & LIN LLC

in those actions will result in the total resolution of the instant action against Defendant Centric Bank, Defendant Terrence Monteverde (who at the time of filing the Complaint was a former employee of Centric Bank, but upon information and belief, is again its employee) and Defendant William McGrath (who at the time of filing the Complaint was employed by Centric Bank, but upon information and belief is no longer). Accordingly, Plaintiff seeks this extension to facilitate those settlement discussions.

We thank the Court for its attention to this matter.

Respectfully submitted,

LEWIS & LIN, LLC

A handwritten signature in black ink, appearing to read "Lauren Valli", is written above a horizontal line.

Lauren Valli (*pro hac vice* forthcoming)